REMARKS

In the Office Action, claims 1-46 were rejected. Claim 1 is presently amended to correct a clerical error. Claims 1-46 remain pending in the present application. All of the pending claims are believed to be clearly allowable over the cited art. Accordingly, reconsideration and allowance of all the claims are requested.

Rejection Under 35 U.S.C. § 102

The present application includes independent claims 1, 14, 24, 32 and 39. In the Office Action, the Examiner rejected all of these claims along with the claims depending therefrom under 35 U.S.C. §102(e) as anticipated by Kuribayashi et al. (U.S. Patent No. 6,480,846 B2).

Applicants respectfully traverse the rejection under 35 U.S.C. § 102. Anticipation under section 102 can be found only if a single reference shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 227 U.S.P.Q. 773 (Fed. Cir. 1985). For a prior art reference to anticipate under section 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). Accordingly, the Applicants need only point to a single element not found in the cited reference to demonstrate that the cited reference fails to anticipate the claimed subject matter. Further, Applicants respectfully remind the Examiner that the *drawings* of the cited reference must be evaluated for what they *reasonably disclose and suggest* to one of ordinary skill in the art. *In re Aslanian*, 590 F.2d 911, 200 U.S.P.Q. 500 (C.C.P.A. 1979).

Claim 1 and the Claims Depending Thereform

In the Office Action, the Examiner analyzed the Kuribayashi et al. reference to include all of the elements of claim 1 and the claims depending therefrom. However, Applicants respectfully assert that the Kuribayashi et al. reference fails to disclose at least

three features of independent claim 1. Accordingly, Applicants assert that the Kuribayashi et al. reference is deficient for at least three reasons and that the rejection under 35 U.S.C. § 102 is inappropriate. Each of these deficiencies in the Kuribayashi et al. reference is discussed in detail below.

I. The Kuribayashi et al. reference fails to teach "storing in a memory object of each component, data representative of the respective component and of a physical configuration of the component."

In the Office Action, the Examiner asserted that the Kuribayashi et al. reference teaches "storing in a memory object of each component data representative of the respective component and of a configuration of the component (information for dimensions and shapes which read on data representative of the respective component and of a configuration of the component)." Office Action, page 2. Specifically, the Examiner cited a passage of the Kuribayashi et al. reference at col. 8, lines 40-64 along with Fig. 8 of the reference as teaching this feature of the present claim 1. *Id.* Relevant portions of the passage cited by the Examiner are set forth below:

> The mounting position data A can be formed, e.g., by a device for CAD 11 and input to the data processor 3 every time each piece of mounting position data is formed, or total pieces of mounting position data may be stored once and transferred to the data processor 3. Alternatively, a storage medium storing the mounting position data A may be loaded to the data processor 3 for its utilization. The storage medium 12 providing the component text data B stores therein, as shown in FIG. 8, the image data IM of various kinds of components including components to be mounted and the component text data B of necessary information for mounting of components, e.g., shapes, dimensions, packing forms, colors and the like of components. Both data are stored in the storage medium 12 after being edited in accordance with a predetermined classification method.

Kuribayashi et al., col. 8, lines 40-55.

In fact, the cited reference does not teach the above-recited feature of claim 1. The Kuribayashi et al. reference is directed to a "storage medium (computer readable medium) 12, which is a CD-ROM." Kuribayashi et al., col. 7, lines 43-44. As is clearly illustrated by Fig. 1A of the Kuribayashi et al. reference, the storage medium 12 is separate and distinct from any of the various components for which it stores image data. *See* Kuribayashi et al., col. 4, lines 50-54. In contrast, claim 1 recites that data is stored in *a memory object of each component* of the recited system. The storage medium 12 of the Kuribayashi et al. reference is certainly not a memory object *of* a component. In other words, the storage of information on a CD-ROM, as disclosed by the Kuribayashi et al. reference, is in no way equivalent to the storing data representative of a respective component and of a physical configuration of the component in a memory object *of the component* itself. Accordingly, the cited reference fails to teach this feature of claim 1.

II. The Kuribayashi et al. reference fails to teach "accessing the data from the memory objects via a data network."

In the Office Action, the Examiner asserted that the Kuribayashi et al. reference teaches "accessing the data from the memory objects via a data network." Office Action, page 2. Specifically, the Examiner cited a passage of the Kuribayashi et al. reference at col. 4, lines 49-53 as teaching this feature of the present claim 1. *Id.* The relevant part of the passage cited by the Examiner, in context, is set forth below:

> According to a fifth aspect of the present invention, there is provided a component electronic catalog according to the first aspect, wherein the storage medium is detachable from a reading device for reading out stored contents of the medium from the medium.

Kuribayashi et al., col. 4, lines 50-54.

Applicants assert that the cited portion of the Kuribayashi et al. reference has no apparent relevance to the above-recited feature of claim 1. Indeed, the entire Kuribayashi

et al. reference, and particularly the passages relied upon by the Examiner, in no way teach the presently recited procedure. Rather, the reference simply teaches that catalog data, stored on a storage medium, are transmitted to another device or vice versa by communication. *See* Kuribayashi et al., col. 4, lines 55-59. The catalog data discussed in the Kuribayashi et al. reference is not accessed from the components themselves or memory objects stored in the components. Accordingly, the Kuribayashi et al. reference does not teach accessing data *from the memory objects*, as presently recited in claim 1.

III. The Kuribayashi et al. reference fails to teach "generating a user viewable representation of the system based upon the data, the representation including physical representations of each component positioned with respect to one another."

In the Office Action, the Examiner asserted that the Kuribayashi et al. reference teaches "generating a user viewable representation of the system based upon the data, the representation including physical representations of each component positioned with respect to one another." Office Action, page 2. Specifically, the Examiner cited a passage of the Kuribayashi et al. reference at col. 3, lines 22-29 along with Fig. 33 of the reference as teaching this feature of the present claim 1. *Id.*

Fig. 33 of the Kuribayashi et al. reference actually relates to prior art discussed in the reference. Specifically, Fig. 33 is an example of a window display screen relating to an applied circuit, and a window display screen of a selected block diagram. *See* Kuribayashi et al., col. 3, lines 32-35. Further, based on the discussion of Fig. 33 and the content of the figure itself, it is clear that Fig. 33 merely teaches displaying a diagrammatical view of selected circuits.

In contrast to the Kuribayashi et al. reference, claim 1 recites a representation including *physical representations of each component positioned with respect to one another*. As noted in the present application, such physical representations can greatly

assist in analyzing and servicing systems of components, even without any prior knowledge of the physical location of the individual components.

IV. Request for Reconsideration and Allowance

Because the Kuribayashi et al. reference clearly does not teach the features of claim 1 or any equivalent features, it cannot anticipate claim 1. Accordingly, claim 1 and the claims depending therefrom are believed to be clearly patentable over Kuribayashi et al. Therefore, Applicants respectfully request withdrawal of the rejection of claim 1 and the claims depending therefrom. Further, Applicants respectfully request reconsideration and allowance of claim 1 and the claims depending therefrom.

Claim 14 and the Claims Depending Therefrom

The Examiner did not address any distinction between claim 1 and claim 14. Insomuch as the Examiner's rejection is identical on both of these claims, claim 14 is believed to be equally patentable for the reasons summarized above with respect to claim 1. Furthermore, claim 14 recites additional subject matter not addressed by the Examiner. Most notably, claim 14 includes the generation of a database including component designation data and physical location data. The Examiner did not contend that the cited reference discloses or even suggests such database generation. Accordingly, the Examiner has failed to establish a *prima facie* case of anticipation on this point alone.

In view of the remarks set forth above, Applicants assert that independent claim 14 and the claims depending therefrom are clearly patentable over the cited reference. Accordingly, Applicants respectfully request withdrawal of the rejection of claim 14 and the claims depending therefrom. Further, Applicants respectfully request reconsideration and allowance of claim 14 and the claims depending therefrom.

Claim 24 and the Claims Depending Therefrom

In the Office Action, the Examiner analyzed the Kuribayashi et al. reference to include all of the elements of claim 24 and the claims depending therefrom. However, Applicants respectfully assert that the Kuribayashi et al. reference fails to disclose at least three features of independent claim 24. Accordingly, Applicants assert that the Kuribayashi et al. reference is deficient for at least three reasons and that the rejection under 35 U.S.C. § 102 is inappropriate. Each of these deficiencies in the Kuribayashi et al. reference is discussed in detail below.

I. The Kuribayashi et al. reference fails to teach "storing component designation data and physical configuration data in the memory object of each programmable component."

In the Office Action, the Examiner asserted that the Kuribayashi et al. reference teaches "[s]toring component designation data and physical configuration data in the memory object of each programmable component." Office Action, page 3. Specifically, the Examiner cited a passage of the Kuribayashi et al. reference at col. 8, lines 40-64 along with Fig. 8 of the reference as teaching this feature of the present claim 24. *Id.* This passage is the same passage the Examiner cited regarding claim 1. The cited passage is quoted *supra*.

The cited reference does not teach the above-recited feature of claim 24. As discussed above, the Kuribayashi et al. reference is directed to a "storage medium (computer readable medium) 12, which is a CD-ROM." Kuribayashi et al., col. 7, lines 43-44. The storage medium 12 is clearly separate and distinct from any of the various components for which it stores image data. *See* Kuribayashi et al., Fig. 1A and col. 4, lines 50-54. In contrast, claim 24 recites storing component designation data and physical configuration data *in the memory object of each programmable component*. The storage medium 12 of the Kuribayashi et al. reference is certainly not a memory object *of* a programmable component itself. Accordingly, the Kuribayashi et al. reference fails to teach this feature of independent claim 24.

II. The Kuribayashi et al. reference fails to teach "polling the components for the component designation data and the physical disposition data."

Independent claim 24 recites "*polling the components* for the component designation data and the physical disposition data." In the Office Action, the Examiner cites col. 3, lines 22-29 and Fig. 33 of the Kuribayashi et al. reference as support for the assertion that the reference anticipates this feature of claim 24.

Applicants assert that the cited portion of the Kuribayashi et al. reference has no apparent relevance to the above-recited feature of claim 24. Indeed, the entire Kuribayashi et al. reference, and particularly the passages relied upon by the Examiner, in no way teach the presently recited procedure. Rather, the reference simply teaches that catalog data, stored on a storage medium, are transmitted to another device or vice versa by communication. *See* Kuribayashi et al., col. 4, lines 55-59. The catalog data discussed in the Kuribayashi et al. reference is not accessed by *polling the components themselves*. It is transmitted from the *storage medium*. Accordingly, the Kuribayashi et al. reference does not teach "*polling the components,*" as presently recited in claim 24.

III. The Kuribayashi et al. reference fails to teach "generating a real time elevation view of the system based on the component designation data and the physical disposition data, the view including representations of each component positioned with respect to one another in the system."

In the Office Action, the Examiner asserted that the Kuribayashi et al. reference teaches "generating a real time *elevation view* of the system ... the view including representations of each component *positioned with respect to one another* in the system." Office Action, page 2. Specifically, the Examiner cited a passage of the Kuribayashi et al. reference at col. 3, lines 22-29 along with Fig. 33 of the reference as teaching this feature of the present claim 1. *Id.*

As discussed above, Fig. 33 of the Kuribayashi et al. reference actually relates to prior art discussed in the reference. Specifically, Fig. 33 is an example of a window display screen relating to an applied circuit and a window display screen of a selected block diagram. *See* Kuribayashi et al., col. 3, lines 32-35. Further, based on the discussion of Fig. 33 and the content of the figure itself, it is clear that Fig. 33 merely teaches displaying a diagrammatical view of selected circuits.

In contrast to the Kuribayashi et al. reference, claim 24 recites generating a real time *elevation view* of the system. Applicants respectfully assert that the diagrammatical views represented in the Kuribayashi et al. reference are not equivalent to an *elevation view* as currently recited. An elevation view refers to a view, such as a physical layout view, that is well known by those of ordinary skill in the art. Indeed, Applicants respectfully assert that one of ordinary skill in the art would recognize that the diagrammatical representations in Fig. 33 are not equivalent to an elevation view. Further, Applicants respectfully assert that Fig. 33 certainly does not teach representations of each component positioned *with respect to one another*, as recited in claim 24. Accordingly, the cited reference does not anticipate these features of claim 24.

IV. Request for Reconsideration and Allowance

Because the Kuribayashi et al. reference clearly does not teach the features of claim 24, or any equivalent features, it cannot anticipate claim 24. Accordingly, claim 24 and the claims depending therefrom are believed to be clearly patentable over Kuribayashi et al. Therefore, Applicants respectfully request withdrawal of the rejection of claim 24 and the claims depending therefrom. Further, Applicants respectfully request reconsideration and allowance of claim 24 and the claims depending therefrom.

Claim 32 and the Claims Depending Therefrom

The Examiner did not address the subject matter of claim 32 with any specificity. Claim 32 is a system claim reciting a plurality of electrical components, with each

component including a memory object allocated for component designation data and physical location data. The claim further recites a data network linking the components, and a monitoring station linked to the components via the network. A processor of the monitoring station is configured to access the data from the components and to generate and display a representation of the system.

As noted above with regards to claim 24, the cited reference in no way discloses storing information in such components or accessing the information from the components for generation of any display whatsoever. Because the reference fails in this regard, and because the Examiner did not address any of the elements of claim 32 or how they would be anticipated by the reference, a *prima facie* case of anticipation has not been established. Accordingly, claim 32 and the claims depending therefrom are believed to be clearly patentable over the cited reference, and their reconsideration and allowance are requested.

Claim 39 and the Claims Depending Therefrom

Claim 39 was not addressed with any specificity. Applicants note that its recitations and scope are different from those of claim 24. Claim 39 is directed to a networked motor control center that includes a plurality of electrical power control components disposed in an enclosure. Each of the components has a memory object for storing component designation data and physical configuration data. A data network links the electrical components, and a monitoring station is linked to the components via the network. The monitoring station includes a processor that is configured to access the component designation data and physical location data from the components via the network, and to generate and display a representation of the system.

As noted above, the Kuribayashi et al. reference does not disclose storing such data in components or accessing the data from components for generation of a view of any type. Moreover, the Examiner did not contend that the reference discloses such recitations. Accordingly, a *prima facie* case of anticipation has not been established with
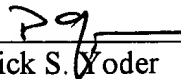
regard to claim 39. For at least these reasons, claim 39 and the claims depending therefrom are believed to be clearly allowable over the cited reference, and their reconsideration and allowance are requested.

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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